

CHARGE OF DISCRIMINATION		AGENCY	CHARGE NUMBER
This form is affected by the Privacy Act of 1974; see Privacy Act Statement on reverse before completing this form.		<input checked="" type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC	450-2023-06505
Texas Workforce Commission – Civil Rights Division and EEOC (State or Local Agency, if Any)			
NAME (Indicate Mr., Ms., or Mrs.) Mr. Christopher Yoon		HOME TELEPHONE NUMBER (include Area Code) 815-979-8288	
STREET ADDRESS 1050 W. Monroe St., #104		CITY, STATE AND ZIP CODE Chicago, IL 60607	DATE OF BIRTH 9/10/87
NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below).			
NAME Samsung Electronics North America	NO. OF EMPLOYEES/MEMBERS 500+	TELEPHONE NUMBER (include Area Code)	
STREET ADDRESS 6625 Excellence Way	CITY, STATE AND ZIP CODE Plano, TX 75023	COUNTY Collin	
NAME	NO. OF EMPLOYEES/MEMBERS	TELEPHONE NUMBER (include Area Code)	
STREET ADDRESS	CITY, STATE AND ZIP CODE		
CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))		DATE DISCRIMINATION TOOK PLACE	
<input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> SEX <input checked="" type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input checked="" type="checkbox"/> OTHER (Specify) Texas Labor Code		EARLIEST 01/2021	LATEST 12/5/2022
THE PARTICULARS ARE (If additional space is needed, attached extra sheet(s))		<input type="checkbox"/> CONTINUING ACTION	
<ol style="list-style-type: none"> <li>1. I first started working for Samsung in or around February 19, 2020, as a Senior Manager, Mobile Business Strategy.</li> <li>2. Later, my title changed to Senior Professional, Customer/Market Insights.</li> <li>3. I always gave my best efforts to Samsung and had hoped to continue working there for the rest of my career.</li> <li>4. I had no formal discipline with Samsung prior to my termination.</li> <li>5. I am an evangelical Christian.</li> <li>6. I also maintain a public YouTube channel to which I frequently post videos discussing my Christian beliefs.</li> <li>7. I started that channel in mid-2020.</li> <li>8. In or around January 2021, VP Paul Kim called me and told me the company had learned of my YouTube channel and wanted to have a conversation with me about it.</li> <li>9. On or about January 15, 2021, I had a Webex meeting with Senior Legal Counsel Dan Berrios and Head of Mobile HR Business Partner Sandra Sanchez.</li> <li>10. Mr. Berrios and Ms. Sanchez told me the company had conducted an audit of my YouTube Channel.</li> <li>11. Mr. Berrios and Ms. Sanchez told me that I was required to keep my YouTube channel separate from Samsung and that I had to make sure neither I nor any commenters made any comments linking me to Samsung.</li> <li>12. Notably, I receive thousands of comments on my videos.</li> <li>13. It was very clear that Samsung absolutely did not want to be associated with my YouTube channel.</li> <li>14. Either Mr. Berrios and Ms. Sanchez or Mr. Kim informed me that the company had received "reports" about my channel.</li> <li>15. I explained that my YouTube channel was a way for me to express my Christian religious views, and Mr. Berrios and Ms. Sanchez acknowledged that.</li> <li>16. After that meeting, I was very careful to follow the company's requirements and ensure nothing I posted connected me to Samsung.</li> <li>17. Between January 2021 and my termination, I removed at minimum dozens of comments in an effort to comply with Samsung's request.</li> </ol>			

18. In or around December 2021, I requested and received a religious exemption for the company's COVID-19 vaccination requirement.
19. On February 11, 2022, HR Business Partner Lauren Brumley emailed me to ask me to remove a viewer comment on a video that referred to me as a manager at Samsung from a full year before, February 21, 2021.
20. I was not able to find that particular comment to delete it, and told Ms. Brumley as much.
21. In addition, I performed a sweep through my other videos to ensure there were no other viewer comments about Samsung, deleted them, and informed Ms. Brumley as much.
22. On or about November 5, 2022, someone calling themselves "Howard Brown" sent a mass email to Samsung HR complaining about one of my videos.
23. On or about December 5, 2022, I received a quarterly performance review from director Matt Turner.
24. This was a very positive review that expressed no concerns about my performance.
25. The very same day, I was invited to a call with Ms. Brumley and the new Head of Mobile HR Business Partner who had replaced Ms. Sanchez.
26. They started the meeting by specifically forbidding me from recording them.
27. They told me I was being fired for violating the company's social media policy.
28. I asked how I had supposedly violated the policy.
29. They told me they would not give me specific details, like which video(s) or which comment(s) were supposedly the problem.
30. Unlike Ms. Brumley's email back in February 2022, they did not ask or even suggest that I take anything down from my channel to address their concerns.
31. The only other detail they shared was that people were able to connect me to Samsung through my LinkedIn.
32. When I later made a request for my personnel records under the Illinois Personnel Record Review Act, none of the items the company produced that appeared to be related to my termination had anything connecting me to Samsung.
33. In reality, Samsung fired me because of the religious beliefs I expressed.
34. Samsung's actions were arbitrary and capricious and can be used to draw an inference of discrimination on the basis of my religion.
35. Samsung has violated the Texas Labor Code and Title VII of the Civil Rights Act of 1964.

I want this charge filed with the EEOC and the Texas Workforce Commission. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the foregoing is true and correct.

*Chris Yoon*  
Date June 2, 2023 Charging Party (Signature)

NOTARY - (When necessary to meet State and Local Requirements)

*SS Shah*

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

*Chris Yoon*

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE:

(Month, day and year)

06/02/2023

EEOC FORM 5 (Rev. 07/99)

"This is an original document"

*Chris Yoon*

State of Illinois - County of Cook

This instrument was acknowledged before me on 06-02-2023 (Date)

By CHRISTOPHER N YOON

